February 19, 2008

Commission's Secretary
Ms. Marlene H. Dortch
Federal Communications Commission
445 12th Street SW
Suite TW-A325
Washington, DC 20554

Reference: EB-06-36, Certification of CPNI Filing of Interior Telephone Company, Inc.

Dear Ms. Dortch:

Enclosed is the 2007 CPNI compliance certificate of Interior Telephone Company, Inc. (TRS 205189) in response to the Public Notice issued by the Federal Communication Commission. The Enforcement Bureau has requested the compliance certificate as required by section 64.2009(e) of the Commission's rules.

Please contact me with any questions or concerns.

Marie Burner

Sincerely,

Marnie Brennan

Chief Marketing Officer

cc: Federal Communications Commission (2 Copies)

**Enforcement Bureau** 

**Telecommunications Consumers Division** 

445 12th Street, SW

Washington, DC 20554

Best Copy and Printing, Inc. (BCPI), fcc@bcpiweb.com (1) Copy

**NetWorks** 

Interior Telephone

Mukluk Telephone

arctic net

**Eyecom Cable** 

Long Distance

TelAlaska

201 E. 56th Ave. Anchorage, AK 99518 907.563.2003 Fax 907.565.5539 www.telalaska.com

## Annual 47 C.F.R. §64.2009(e) CPNI Certification EB Docket 06-36

Annual 64-2009(e) CPNI Certification for 2007

Date filed: February 19, 2008

Name of Company Covered by this certification: Interior Telephone Company, Inc.

Form 499 Filer ID: 805689
Name of signatory: Marnie Brennan

Title of signatory: Chief Marketing Officer

I, Marnie Brennan, certify that I am an officer of Interior Telephone Company, Inc., and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. §64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the Interior Telephone Company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions against data brokers in the past year. To the best of our knowledge, no pretexters have attempted to access CPNI at our company.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

I hereby certify that the statements contained within this certification and within its incorporated CPNI Policy and Procedures Manual are accurate and complete to the best of my ability.

Marnie Brennan, Chief Marketing Officer (CMO)

Interior Telephone Company, Inc.

Marie Burno

201 E 56<sup>th</sup> Avenue Anchorage, AK 99518

(907) 563-2003

## **CPNI Compliance Accompanying Statement:**

This accompanying statement explains how Interior Telephone's operating procedures ensure that the company is in compliance with the rules governing CPNI as found in Subpart U – Customer Proprietary Network Information – Part 64 of Title 47 of the Code of Federal Regulations.

Interior Telephone adheres to all CPNI rules as stated in section 64.2001 - 64.2011 concerning the proper use of our customer's CPNI. Specifically, our notice for use of CPNI approval process meets all requirements as listed in Section 64.2008. To further protect our customer's privacy, we have implemented all safeguards required in Section 64.2009. This includes:

- The implementation of a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI;
- The training of appropriate personnel as to when they are, and are not, authorized to use
   CPNI and the documentation of this training;
- The implementation of an express disciplinary process for CPNI violations up to and including termination;
- The maintenance of a record, for at least one year, of our own, and our affiliates' sales and marketing campaigns;
- The establishment of a supervisory review process regarding carrier compliance with the federal CPNI rules for outbound marketing situations; and
- The establishment of annual certification by a corporate officer with personal knowledge of Interior Telephone's policies and procedures to ensure compliance with the federal CPNI rules.
- The establishment of procedures for notification of the Commission of any instance where opt-out mechanisms, do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.

In addition, to the foregoing acknowledgments, and incorporated as part of this certification, attached is Interior Telephone's CPNI policy and procedures manual that Interior Telephone is using to comply with the Commission's restriction on the use of CPNI (such as distinguishing the CPNI of customers who have not consented to Interior Telephone's use of this information for marketing purposes).

I hereby certify that the statements contained within this certification and within its incorporated CPNI Policy and Procedures Manual are accurate and complete to the best of my ability.

Marnie Brennan, Chief Marketing Officer (CMO)

Interior Telephone Company, Inc.

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